IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

FINJAN SOFTWARE, LTD., an Israel corporation,
 	
               Plaintiff,
 	
        v.
 	
SECURE COMPUTING CORPORATION, a Delaware corporation, CYBERGUARD, CORPORATION, a Delaware corporation, WEBWASHER AG, a German corporation and DOES 1 THROUGH 100,
 	
               Defendants.
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	) Civil Action No. 06-369 (GMS)
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FINAL JOINT CLAIM CONSTRUCTION CHART

Plaintiff Finjan Software Limited ("Finjan") and Defendants Secure Computing Corporation, Cyberguard Corporation and Webwasher AG (collectively "Secure Computing") jointly submit their Final Joint Claim Construction Chart for the patents-in-suit:

- U.S. Patent No. 6,092,194 ("the '194 Patent");

- U.S. Patent No. 6,804,780 ("the '780 Patent");

- U.S. Patent No. 7,058,822 ("the '822 Patent");

- U.S. Patent No. 6,357,010 ("the '010 Patent"); and

- U.S. Patent No. 7,185,361 ("the '361 Patent").

After meeting and conferring several times, the parties reached agreement regarding the construction of some terms found in the '194 Patent, the '822 Patent, the '010 Patent and the '361 Patent. Exhibit A hereto sets forth those terms and the agreed-upon construction.

Exhibit B hereto sets forth the parties' respective construction of disputed claim language with citations to the intrinsic evidence in support of their respective proposed constructions.

Attached as Exhibit C are a number of terms that Secure Computing has identified as indefinite.

Should the Court have any questions regarding the Chart, the parties will make themselves available at a time convenient for the Court.

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EXHIBIT A

EXHIBIT A

Stipulated Construction of Terms for United States Patent No. 6,092,194

Terms from United States Patent No. 6,092,194	Agreed Construction
access control	criteria indicating whether or not to prevent execution of the Downloadable

Stipulated Construction of Terms for United States Patent No. 7,058,822

Terms from United States Patent No. 7,058,822	Agreed Construction
mobile protection code	code capable of monitoring or intercepting potentially malicious code
protection policies	rules or policies for causing one or more predetermined operations to be performed if malicious code is intercepted
sandboxed package	protective environment

Stipulated Construction of Terms for United States Patent No. 6,357,010

Terms from United States Patent No. 6,357,010	Agreed Construction
authenticates / authenticating	validating the identity of a user
authorization	approval for a request
data owner interface	an interface that is managed by one or more trusted individuals within an organization
external interface	an interface for receiving request from an external network
go list	a list which is unique to each role and used by the document control server to determine which documents an authenticated business partner may be allowed to display

Stipulated Construction of Terms for United States Patent No. 7,185,361

Terms from United States Patent No. 7,185,361	Agreed Construction
network resource requests	a request for an application or resource on an external server

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EXHIBIT B

EXHIBIT B

Proposed Construction and Intrinsic Evidence For Disputed Terms
In United States Patent No. 6,092,194

Terms from United States Patent No. 6,092,194	Finjan's Proposed Construction & Intrinsic Evidence	Secure Computing's Proposed Construction & Intrinsic Support
addressed to a client	ordinary meaning within the context of the claims **'194 Patent** col. 1, line 65- col. 2, line 10; col. 2, line 66 – col. 3, line 61; col. 9, line 61 – col. 10, line 6; relevant claims; Office Action mailed July 17, 1999; Response to Office Action mailed June 17, 1999	addressed: containing the client computer's IP address client: the destination computer **'194 Patent** col.1 l.67- col.2 l.6; col.10 ll.16-17 **'520 Patent** fig.2; col.2 ll.56-62; col.3 ll.1-41; col.5 ll.59-60
Downloadable	program or document containing mobile code **'194 Patent** abstract; col. 1, lines 37-67 relevant claims; Office Action mailed June 17, 1999; Response to Office Action mailed June 17, 1999 **'780 Patent** Office Action mailed July 1, 2003; Response to Office Action mailed July 1, 2003 **'822 Patent**	a program or document containing an executable application program that can be downloaded from one computer to another computer **'194 Patent** col.1 ll.44-47

	abstract; col. 1, lines 55-61; col. 2, lines 36-64; col. 3, lines 41-48; col. 5, lines 34-40; col. 6, lines 1-11; col. 7, lines 10-14; col. 9, lines 14-29; col. 12, lines 18-22 relevant claims	a computer that receives data from its external communications interface and transfers the data through its internal communications interface to the client **'194 Patent** fig.2; col.3 ll.27-41
server that serves as a gateway to the client	ordinary meaning within the context of the claims **'194 Patent** col. 3, lines 23-41; relevant claims; Office Action mailed June 17, 1999; Response to Office Action mailed June 17, 1999	

**Proposed Construction and Intrinsic Evidence For Disputed Terms
In United States Patent No. 6,804,780**

Terms from United States Patent No. 6,804,780	Finjan's Proposed Construction & Intrinsic Evidence	Secure Computing's Proposed Construction & Intrinsic Support
performing a hashing function on the Downloadable and the fetched software components to generate a Downloadable	ordinary meaning within the context of the claims **'780 Patent** abstract; col. 2, lines 12-16; col. 4, lines 54-66; col. 7, lines 63-67; col. 9, lines 62-67; relevant claims; Office Action mailed July 1, 2003; Response to Office Action mailed July 1, 2003	performing a hashing function on both the Downloadable and the fetched software components together to generate a single Downloadable ID **'780 Patent** fig.8; col.9 ll.58-67; File history, July 31, 2003 Amendment and Response to Office Action at 7

Proposed Construction and Intrinsic Evidence For Disputed Terms
In United States Patent No. 7,058,822

Terms from United States Patent No. 7,058,822	Finjan's Proposed Construction & Intrinsic Evidence	Secure Computing's Proposed Construction & Intrinsic Support
downloadable-information	program or document that can contain mobile code **'194 Patent** abstract; col. 1, lines 37-67 relevant claims; Office Action mailed June 17, 1999; Response to Office Action mailed June 17, 1999 **'780 Patent** Office Action mailed July 1, 2003; Response to Office Action mailed July 1, 2003 **'822 Patent** abstract; col. 1, lines 55-61; col. 2, lines 36-64; col. 3, lines 41-48; col. 5, lines 34-40; col. 6, lines 1-11; col. 7, lines 10-14; col. 9, lines 14-29; col. 12, lines 18-22 relevant claims	data downloaded from one computer to another **'822 Patent** col.6 ll.1-12; col.14 l.64-col.15 l.4; col.9 ll.14-29;fig.3
evaluating the detection indicators	ordinary meaning within the context of the claims **'822 Patent** col. 12, lines 56-61; col. 16, lines 51-56; col. 19, line 40 - col. 20, line 3; relevant	analyzing two or more detection indicators to determine whether executable code is detected **'822 Patent** col.16 ll.31-50

	claims	
information-destination	client **'822 Patent** col. 2, lines 42-53; col. 3, lines 41-48; col. 4, lines 11-27; col. 6, line 59 – col. 7, line 28; col. 7, lines 39-64; col. 11, lines 10-33; col. 17, lines 34-40; relevant claims	a device or process that is capable of receiving and initiating or otherwise hosting a mobile code execution **'822 Patent** Col. 7 ll.60-64
information-recommunicator	server **'822 Patent** col. 2, lines 56-64; col. 6, line 59 - col. 7, line 28; col. 7, lines 49-56; col. 8 line 64 – col. 9, line 13; col. 19, lines 5-11; relevant claims	information supplier or intermediary for servicing one or more further interconnected devices or processes or interconnected levels of devices or processes **'822 Patent** col.7 ll.49-56
level of downloadable-information characteristic and executable code characteristic correspondence	ordinary meaning within context of the claim **'822 Patent** col. 19, line 40 – col. 20, line 3; relevant claims	a value representing the degree of correspondence between the downloadable-information characteristic and the executable code characteristic **'822 Patent** col.19 ll.62-67

Proposed Construction and Intrinsic Evidence For Disputed Terms
In United States Patent No. 6,357,010

Terms from United States Patent No. 6,357,010	Finjan's Proposed Construction & Intrinsic Evidence	Secure Computing's Proposed Construction & Intrinsic Support
document control server	a mechanism which allows a specified business partner to access documents on another company's non-public internal network **'010 Patent** abstract; col. 1, line 65 – col. 2, line 1; col. 2, lines 23-30; col. 3, lines 6-16; col. 4, lines 42-65; col. 6, lines 8-9; col. 13, lines 16-19; col. 14, lines 63-67; col. 16, lines 1-19; relevant claims; Office Action mailed June 1, 2000; Response to Office Action mailed June 1, 2000; Office Action mailed January 17, 2001; Response to Office Action mailed January 17, 2001	ordinary meaning within context of the claim
fetching the requested document	obtaining, parsing, and cleaning the document **'010 Patent** col. 3, lines 45-50; relevant claims; Office Action mailed June 1, 2000; Response to Office Action mailed June 1, 2000; Office Action mailed January 17, 2001; Response to Office Action mailed January 17, 2001	ordinary meaning within context of the claim

proxy	a process performed by a firewall in which the actual destination on the internal network is hidden from the business partner who is requesting the connection from an external network **'010 Patent** col. 13, lines 51-67; relevant claims; Office Action mailed June 1, 2000; Response to Office Action mailed June 1, 2000; Office Action mailed January 17, 2000; Response to Office Action mailed January 17, 2001	ordinary meaning within context of the claim
role	an alias which provides access to a list of allowed documents **'010 Patent** col. 2, lines 2-3; col. 4, lines 11-35; col. 6, lines 19-54; relevant claims; Office Action mailed June 1, 2000; Response to Office Action mailed June 1, 2000; Office Action mailed January 17, 2001; Response to Office Action mailed January 17, 2001	membership in a group of one or more **'010 Patent** col.4 ll.19-34; col.12 ll.45-59

Proposed Construction and Intrinsic Evidence For Disputed Terms
In United States Patent No. 7,185,361

Terms from United States Patent No. 7,185,361	Finjan's Proposed Construction & Intrinsic Evidence	Secure Computing's Proposed Construction & Intrinsic Support
a server having at least one directory that can be accessed using a network protocol	an internal server having an LDAP directory that stores information about users, offers a static view of information and allows simple updates without transactions **'361 Patent** col. 2, lines 17-27; col. 2, lines 62-67; col. 4, lines 17-19; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action Mailed June 14, 2006	ordinary meaning within context of the claim

authorization filter	a module to determine whether one or more attributes of the client user's LDAP entry is satisfied or whether the client user is a member of a group in the LDAP directory **'361 Patent** col. 5, lines 25-27; col. 6, lines 32-45; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action mailed May, 16, 2005; Response to Office Action Mailed may 16, 2005; Office action mailed June 14, 2006; Response to Office Action Mailed June 14, 2006	ordinary meaning within context of the claim
directory schema that is predefined by said entity	an authentication scheme specified to interact with an existing LDAP directory that has been uniquely developed for an organization's internal needs **'361 Patent** abstract; col. 3, lines 1-19; col. 4, lines 56-59; col. 2, lines 62-67; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office	ordinary meaning within context of the claim

	Action mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action mailed June 14, 2006	ordinary meaning within context of the claim
firewall	firewall that does not authenticate users using its own database but, rather, information contained within an LDAP directory **'361 Patent** col. 2, lines 53–67; col. 4, lines 41–47; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action mailed June 14, 2006	ordinary meaning within context of the claim
network protocol	lightweight directory access protocol **'361 Patent** abstract; col. 3, lines 1-19; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action	ordinary meaning within context of the claim

	Mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action mailed June 14, 2006	ordinary meaning within context of the claim
per-service authorization scheme	a scheme in which the authorization module determines whether the user is in one or more groups in the LDAP directory in order to satisfy the authorization filter **'361 Patent** col. 4 line 65 – col. 5 line 2; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action Mailed June 14, 2006	ordinary meaning within context of the claim
per-user authentication scheme	a scheme in which the authorization module determines whether one or more attributes of the client user's LDAP entry satisfies the authorization filter **'361 Patent** col. 6, lines 32-45; relevant claims; Office Action mailed September 10, 2003; Response to Office Action mailed September 10, 2003; Office Action mailed February 18, 2004; Response to Office	

Action mailed February 18, 2004; Notice of Appeal filed July 19, 2004; Appeal Brief filed February 28, 2005; Office Action mailed May, 16, 2005; Response to Office Action mailed May 16, 2005; Office action mailed June 14, 2006; Response to Office Action Mailed June 14, 2006

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EXHIBIT C

EXHIBIT C

Terms Identified By Secure Computing as Indefinite

United States Patent No. 6,092,194
- Java™ applet
- ActiveX™ Control
- JavaScript™ script
- Visual Basic script

United States Patent No. 6,804,780
- plugin

United States Patent No. 7,058,822
- information monitor
- content inspection engine
- packaging engine
- inspection controller
- MPC generator
- linking engine
- transfer engine
- policy generator
- destination-characteristics
- mobile code means